

1891-005 Chancery Causes: Gdn. of Wade M. Gibson & by vs. Wade M. Gibson & Lee Co.

Kincaid, Beaty, Ewing, Crabtree, McNeil, Litton

CA - Estate Dispute
T - Property

- Deed

To the Hon. H. S. K. Morrison Judge of the Circuit
Court of Lee County Virginia;

Hereby complaining your Orator Thomas S. Gibson Sr.
a citizen of the county and State aforesaid would respectfully
represent, that his late wife Belina Gibson departed this
life on the 12 day of Augt 1888 intestate, and she left at
her death, 6 children her heirs at law, to wit, Hugh Gibson
Amelia Gibson, Wade M. Gibson, Thomas S. Gibson Jr. Benjamin
H. Gibson, and Robert B. Gibson all of whom are your Orators Sons
and Daughters.

Your Orator states that said Hugh and Amelia Gibson, are
now over the age of 21 years, and that he has been duly
appointed and has qualified according to law, as the guardian
for the said Wade M. Thos. S. Jr. Benjamin H. and Robert B. Gibson
and is now acting as such.

Your Orator further states that his late wife, the mother of
said six children, was a daughter of one Letitia Beatty, who
was a sister of the full blood of the late Alexander Ewing dead,
who died intestate in this county within the last two years.

The said Alexander Ewing was an unmarried man, and
he left no issue or legal heirs, and hence his brothers and
sisters and half brothers and sisters, and their descendants, became
his heirs at law.

Your Orator states that the said Alexander Ewing left at
his death one full sister and the descendants of a ^{full} brother and
sister, and eight half brothers and sisters and their descendants
as his heirs at law.

Your Orator states that the brother and sisters of the full blood
and their descendants
are entitled in the distribution of said Alexander Ewing's estate
to double portions thereof while those of the half blood are
entitled to single portions, and thus divided, those three of the
full blood are entitled to $\frac{6}{14}$ th, or $\frac{3}{7}$ each, while those of the
half blood are entitled to $\frac{8}{14}$ or $\frac{4}{7}$ each of his said estate;

1 Your Orator states that his late wife, was a daughter of
2 a sister of the full blood to the said Alexander Ewing, and that
3 sister - Miss Letitia Beatty left at her death 7 children her heirs
4 at law so that these 7 became entitled to $\frac{2}{14}$ ths of said Ewings Estate.
5 And your Orator said six children before named are or were
6 entitled to $\frac{1}{7}$ of $\frac{2}{14}$ ths of said real and personal estate.

7 Your Orator states that said Alexander Ewing at his death
8 left a valuable estate consisting of both real and personal property
9 which descended to his brothers and sisters and his half brothers
10 and sisters and their descendants in the proportions before stated.

11 Your Orator states that since the death of said Ewing, in
12 a suit pending in your court, two small tracts of land
13 which belonged to him has been sold under a decree of your
14 Honor, and the proceeds thereof has gone into the hands of
15 his administrators, but there is still a large tract of land
16 which belongs to his heirs consisting of from 400 to 600 acres, and
17 the same is as yet undivided, and in this tract your
18 Orators said wards are entitled to four sixths of One Seventh
19 of Two fourteenths ^{thereof}, in its undivided condition.

20 Your Orator states that his son Hugh Gibson, and his
21 daughter Anneline Gibson both of whom are over 21 years
22 old, have sold and conveyed their undivided interest in
23 all the real estate of said Alexander Ewing not heretofore sold
24 under a decree of court, to B. F. Kinsaid for Thirty dollars each
25 as will appear by reference to their deed of conveyance herewith
26 filed marked (A.) as part hereof.

27 Your Orator further states, that he, believing it to be to the
28 interest of his said four wards, On the 20th day of Augt 1890
29 under to and did bargain and sell to said B. F. Kinsaid for the
30 sum of One Hundred and Twenty dollars cash in hand, his
31 said four wards undivided interest in said Alex^d. Ewings real
32 estate not heretofore sold under a decree of court, which is thirty
33 dollars per share for each of said four undivided interests.

* Your Orator states that his said wards lands are in an uninclosed condition, that they are not yielding any thing of value in the way of rents and profits, that they are considerably going down in value owing perhaps, to such cultivation, and that the quantity owned by them is too small to be of much value if the same were cleared and run as the property of the said wards by your Orator.

Your Orator further states that he, with his said Daughter -
Anselia Gibson, has executed to the said Kineaid their joint
bond, in the sum of \$250.00 to see that said four wards shall,
as fast as they arrive to the age of 21 years, convey to the
said Kineaid their respective undivided interests in said land
and this Original bond is herewith filed marked (B)

Your Orator avers that the interest of his said wards
will be promoted by a confirmation and ratification of the sale
made by him, to said Kineaid; *

Your Orator states, that in the event his said four wards
~~or any of them~~, should die, before arriving to the age of 21 years
unmarried and without issue, their interest in said land would
descend and pass to ^{Hugh Gibson and Anselia Gibson, their}
~~brother and sister~~ ^{brother and sister} ~~James S. Wood, Catherine E. Wood, Mary~~
~~Harley, Thomas S. Wood, wife of Hiram J. Wood, Margaret~~
~~Thompson, wife of John Thompson and John A. Wood, they being~~
~~the sisters and brother of Anselia Gibson and, being the~~
~~same. And the said John A. Wood is a resident of the~~
~~State of Virginia.~~ Your Orator further states that his said
Four wards are each over the age of 14 years.

Your Orator states that he is advised, that it is competent
for a court of equity, to ratify and confirm the sale made
by him of his said four wards interest in said land, and
to cause a conveyance to be made to said B. F. Kineaid and,
to attain that end is the object of this bill.

The premises considered, your Orator prays that the said
Hede M. Gibson, Thomas S. Gibson Jr. Benjamin H. Gibson, Robert B.
Gibson, Hugh Gibson, Anselia Gibson & B. F. Kineaid be made
defendants to this bill and be required to answer the same
on oath, that a guardian ad litem be appointed for said wards
to defend their interest in this cause, and upon a hearing
thereof, a decree be entered herein ratifying and confirming
said sale and that a commissioner be appointed with directions
to convey said wards interest in said lands to the said B. F. Kineaid

And if in any wise mistaken in this his Special prayer
then your Oration prays for all general relief, May the Can-
nonballs writ of Sp. issue directed to.

Henry J. Morgan for Jeff

I do swear that the facts and statements contained and set out in the foregoing bill, are substantially true as I verily believe. So help me God.

Thos S Gibson

Sworn to before me by J. S. Giblin this 28th day of July 1891.

Henry J. Morgan Bond

Thomas, S. Gilbert, Guelph

ziel

Wieder M. Gilm + others

1891 1st of Aug. Rules Rec'd Jan

37a End, Mrs. G. L. Fildes & Co.

2^d Aug. D. M. Buford & Co.

best for measuring by J. G. G.

Aug. 1866

Aug. Term Sept. 3rd Decr

March 3. 344

7.53	3.00	15.00	5.00	30.53
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To the Hon, H. S. K. Morison Judge of the
Circuit Court of Lee County Virginia;

The Answer of Wade M. Gibson, Thomas S.
Gibson, Jr, Benjamin H. Gibson, and Robert B Gibson,
infant defendants over the age of 14 years but under
the age of 21 years to a bill filed against them
tothens, in this Honorable Court by Thomas S. Gibson
their father and Guardian:

Respondents say it is true that their brother and
sister - Hugh and Sarah Gibson have sold and
conveyed their undivided interest in the Alexander
Living real estate to B. F. Kincaid for the sum of
Thirty dollars per share. And they suppose it is
also true, that their father and Guardian acting
for their best interest as he supposed has bargained and
sold your respondents interest in said land, to the said
B. F. Kincaid for the like sum of Thirty dollars per share,
and while respondents are too young in contemplation
of law, to be able to form a correct opinion, as to
the propriety of such sale, still as their brother and
sister are of full age and have sold their interest in
said land for the price stated, and as their father and guardian
have sold respondents interest in said land for the same
price, and has received the money therefor, Respondents
are not only willing that said sale be ratified & approved
but are anxious that the same be confirmed, and their

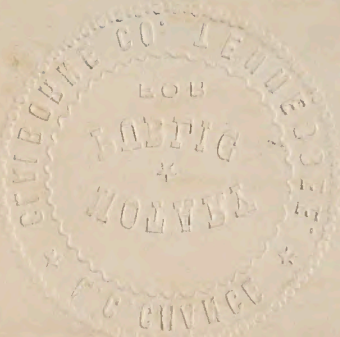
title and interest in said real estate be passed and assigned or transferred to said B. F. Kinsaid and here these respondents join in the plaintiffs prayer to attain that end. And respondents having now answered the the plaintiffs bill as fully as deemed material, pray hence to be dismissed with their cost.

Wade M Gibson

Thomas S. Gibson Jr

Burgoin Hth Gibson
mark

Robert B. Gibson
mark



Wade M Gibson & others

Att. } Joint Answer

Thomas S. Gibson Grand ex

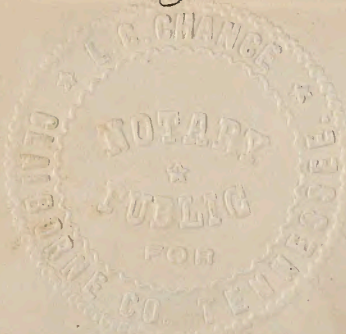
Filed, 2nd Aug. Rules
1891. J. B. Hyatt

State of Tennessee, Claiborne County. ss.

Personally appeared in said County before me, L. C. Chamer
Public, duly elected, commissioned and sworn for said County, the within named bargainor,
Thomas S. Gibson, Burgin A. Gibson & Robert B. Gibson
with whom I am personally acquainted, and who acknowledged
that they executed the annexed instrument for the purposes therein expressed.

My term of office began January 6, 1896, and expires January 6, 1897.

Witness my hand and official seal at office in Cumberland Ky this 21 day of Aug, 1897
L. C. Chamer, Notary Public.



To the Hon. H. S. K. Merison Judge of the Circuit
Court of Lee County Virginia;

The answer of Haden M. Gibbon, Thos. S. Gibbon for
Burgoin H. Gibbon, and Robert B. Gibbon by John M. Morgan
their guardian ad litem, to a bill filed against them^{dothers}
in this Honorable court. by Thomas S. Gibbon Sr. their Guardian

Respondent says that his said wards are young and
of tender years, and being infants are the peculiar wards
of courts of equity, their interest in this suit is
respectfully committed to your Honor's care and keeping;

Respondent says that his said wards although over the age
of fourteen years have not informed him of any fact which
he might, or ought to allege in delay of the plaintiff's prayer
to have the sale made by him to said Kincaid confirmed.
and he knows of no fact within himself, which he ought to so allege
and this being his contention, respondent cannot either admit
or deny the propriety of the sale of his wards lands, made
by their Father and Guardian

Respondent having now answered as fully as deemed
material prays that his said wards be hence discharged
with their costs;

John M. Morgan

Wade M. Gibson & others by
John M. Morgan & A. L. Linton
advs. } Answer

Thos S. Gibson Guardian
Filed 1st Aug Rules 1891
J. A. S. Hyatt clerk

Thomas S. Gibson Executor & Off

Wade M. Gibson & al

Deft.

} See by

This cause came on again this day to be finally tried on the papers heretofore read therein, and the report of Special Comr. Morgan filed in the cause at the present Term, showing that he had executed a deed of conveyance to D. F. Kincaid conveying to him, all the divided & undivided interest of the four infant defendants, in and to the lands of the late Alexander Eving dead, and was argued by counsel, and said report and deed being accepted to. On consideration of all which it is adjudged ordered and decreed that said report and deed be confirmed, and the Clerk of this will deliver to the Clerk of the county Court, said deed for recordation, and it is further adjudged that said Kincaid pay the costs of this suit and no further action being necessary in the cause the parties are hence dismissed, and the cause is stricken from the docket.

Thos S. Gibson Guard

as $\frac{1}{3}$ Dec 102 final

Wade M. Gibson + al

Entered Chas O B
page 344 Sept 3/89
J. A. Hyatt C

Enter this
Sept 3 1891
H. K. M.

Thomas S. Gibson Grand & Peff
vs
Wade M Gibson others Deft

In Chy

This cause came on this day to be heard on the bill of the Peff and exhibits therewith, the answer of the four infant defendants who are over 14 years of age, and their answer by John M. Morgan their guardian ad litem, the disposition of certificates, and the Peff bill taken for confessed by the defendants Hugh Gibson Amelia Gibson & B. F. Kincaid and was argued by counsel. And it appearing to the court from the evidence on file in the cause, that it is to the interest of the infant defendants, that the sale of their interest in the real estate of Alexander Ewing dead made by the Peff as their guardian to the deft. B. F. Kincaid on the 20th day of Augt 1890 be confirmed.

It is therefore adjudged ordered and decreed, that said sale be and the same is hereby ratified approved and confirmed and Henry J. Morgan is appointed a special commissioner for the purpose who is directed to convey to B. F. Kincaid the divided or undivided interest of Wade M. Gibson Thomas S. Gibson Jr. Berengine H. Gibson & Robert B. Gibson in and to all the real estate of the late Alexander Ewing dead, with covenants of special warranty, and he will report his action to the court and until the coming in thereof, the cause is continued,

Thomas S. Gibson Guard

no $\frac{1}{3}$ Decur No 1

Wade M. Gibson sal

Entered Chcy
O.B. page 341,
Sept 2nd 1891.
J. S. Byatt

Enter this
Sept 2nd 1891.
W. S. M.

1 Thomas S. Gibson Guardian & Poff }
2 vs. } Insley
3 Wade M. Gibson & others } Defts

4 Mr John M Morgan guardian ad Litem for Wade M
5 Gibson Thos S Gibson Jr Benjamin H Gibson and Robert B. Gibson

6 Take notice that at the Clerk's office of the Circuit
7 Court of Lee County Va on the 17th day of Augt 1891 I will
8 proceed to take the depositions of Geo L Crabtree A B McNeil and
9 Alexander Sitten which when taken are intended
10 to be read as evidence on behalf of the plaintiff in the above
11 styled cause at the hearing thereof and during their examina-
12 tion the following questions will be propounded to each of them
13 Given under my hand the 15th day of Augt 1891,
14 Thos S. Gibson Sr Guardian

15
16 1st Question Mr George L. Crabtree Please state if you are
17 acquainted with the real estate of the late Alexander Ewing dead,
18 and if so, How long have you known it?

19
20 2nd Question Now as said lands are undivided, what do you think
21 would be a fair and full price, for four sixths, of one seventh of
22 two fourtenths thereof, in its undivided condition?

23
24 3rd Question Would thirty dollars per share be a fair price for
25 the same, or would it be best for the infants for them to keep
26 the land its self?

27
28 4th Question If said land was divided would said infants get a
29 large, or a small quantity, if a large part, state as near as you can
30 the quantity, and if a small quantity, would it not be expensive
31 to fence it? and would not the quantity be so small that it
32 would not be desirable as a homestead and would it not be to a
33 great extent at the mercy of a contiguous land owner?

5 Question Upon the whole, would, or would not,
the interest of said Wards be promoted by a confirmation
of the sale of their lands made by the Pff. to B. F. Kinsaid?

I as the guardian ad litem for said infants hereby accept
legal service of the foregoing notice, and agree that the
deposition of said witnesses be taken on the foregoing questions

Geo M. Morgan G. A. Litem

1 Thomas S. Gibson Guardian & Plff

2 vs

3 Wade M. Gibson & others

Defts

In Chy

4 The deposition of George L. Crabtree & Alex. Littou &
5 J. C. McNeil
6 taken upon notice and interrogatories hereto attached at the
7 clerk's office of the circuit court in Lee County Va. On the 17 day
8 of August 1891. which are intended to be read as evidence
9 on the part of the plaintiff in the above styled suit at the
10 hearing thereof

11 The said George L. Crabtree a witness of lawful age
12 being duly sworn deposes as follows.

13 In answer to the first question the witness says.

14 I am well acquainted with the land
15 owned by Alex. Ewing at the time of his
16 death, I live on an adjoining farm to
17 it, and have known it for several
18 years, and very well for the past
19 two years.

20 In response to the 2nd question witness says
21 I am informed and believe that
22 the $\frac{4}{16}$ interest owned is only about
23 $8\frac{2}{3}$ acres - and I consider that
24 $15\frac{1}{2}$ per acre is a full and fair
25 price therefor in its undivided
26 condition.

27 In answer to the 3rd question the
28 witness says -

29 I think that 30 per share would
30 be a fair price for said land
31 in its present undivided condition
32 and I am of opinion that it
33 would, be best, that the sale referred
to in the Cause be confirmed.

1 In answer to the 4th question witness says.

2 If said lands were divided, said
3 infants would get about 2 acres each
4 and this I regard as a small quan-
5 tity, and my opinion is that it
6 would be expensive to fence, and
7 would be so small, as not to be
8 desirable for a home, and would
9 to some extent be at the mercy of
10 Cantigious land owners.

11 In answer to the 5th question the
12 witness says -

13 I think the interest of the infants
14 would be promoted by a confirma-
15 tion of the sale of their lands
16 made by the Plaintiff to B. F. Fine-
17 aid

18 And further this witness saith not.
19 George I Cor. after

20
21 The said A. C. McNiel a witness of
22 lawful age being duly sworn
23 deposes as follows.

24 In answer to the first question the
25 witness says.

26 I am well acquainted with the
27 real estate owned by Alex. Ewing
28 at the time of his death, and
29 have known it for the past
30 35 years.

31 In answer to the 2nd question witness
32 states - I think one hundred
33 and twenty dollars, would be

1 a fair price for $\frac{4}{10}$ of $\frac{1}{7}$ of $\frac{2}{14}$ thereof.
2 In answer to the 3rd question witness
3 says - I am of opinion that 30¢
4 is a fair price per share for the
5 said lands, and that it would be
6 best for the said infants that the
7 sale thereof made by their father
8 to B. F. Trincard be confirmed.

9 In answer to the 4th question witness
10 states. If said land was divided
11 the four infants would not get
12 more than 8 or 10 acres, and
13 this would be expensive to fence,
14 and the same would be so small
15 it would not be desirable for a
16 home, and would to some
17 extent at the mercy of contiguous
18 land owners -

19 In answer to the 5th question
20 witness states. That upon the whole
21 I am of opinion that the interest
22 of the infants would be promoted
23 by a confirmation of the sale of
24 their lands made by the Pff to B.
25 F. Trincard.

26 And further this witness saith not
27 A. C. McKel

28 Alex. Litton another witness of lawful
29 age being duly sworn deposes and
30 says I have just heard read
31 and given the depositions of George
32 L. Leabtra and A. C. McKel, and
33

I fully concur with them in
the several statements they have
made in response to the several
questions propounded to them
in reference to the sale of said
infants land.
And further this witness saith
not.

Alex Littor

Virginia

Le County to wit:

J. J. Als Hyatt

Clerk of the Circuit Court for County
and State aforesaid, do hereby
certify that the foregoing depositions
of George L. Crabtree, A. C. McNeil & Alex
Littor, were duly taken before me,
subscribed and sworn to by the witnesses
at the time and place and for the
purposes mentioned in the caption.

Given under my hand this Aug. 17/89.

J. J. Als Hyatt clerk

witness claims \$1.00

clerk's fee \$1.50 Paid by J. P. Kincaid

Thomas S. Gibson Grandson

vs. $\frac{1}{3}$ Depositum

Wade M. Gibson & al

Filed Augt. the 17 1891
J. B. St. Hyatt C

Cost Depo \$15.00 paid
By B. F. Kincaid

Thomas S. Gibson Grand &c. Off }
vs. } In Chy
Wade M. Gibson & others Defts }

To the Hon. H. S. Merison Judge of the Circuit
Court of Lee Co Virginia;

As directed by your decree entered in this cause, on
the 2^d day of Sept 1891. I have made signed and acknowledged
ready for record a deed of conveyance to H. F. Kameach, by
which I have conveyed to him with covenants of special
warranty the divided and undivided interest of Wade M. Gibson
Thomas S. Gibson Jr. Benjamin H. Gibson and Robert B. Gibson in and
to all the real estate of the late Alexander Ewing dead, and
said deed is herewith submitted for your inspection & approval

Respectfully Submitted

Henry J. Morgan Special Const.

Thomas S. Gibson Guardian

vs $\frac{2}{3}$ Cont Defect of Deed

Wade M. Gibson et al

Filed Sept Term 1891.

J. A. G. Hyatt C.

1890
This Deed made this 20th day of August, between
Amelia Gibson. ~~Hugh~~ Gibson. Wade M Gibson, Thomas
S. Gibson Jr. Bergoyme H Gibson and Robert B.
Gibson heirs of Selina Gibson deceased of the first
part and Benjamin F Kincaid of the second
part all of the County of Lee, State of Virginia.
Witnesseth. That for and in consideration of ^{except ~~Hugh~~ Gibson who lives} ^{State Kentucky}
the sum of One hundred and Eighty Dollars
in hand paid, the receipt of which is hereby ack-
nowledged, the parties of the first part do by these
presents, give, grant, bargain, sell, release and
convey unto the said B. F. Kincaid all their
undivided right, title and interest in and
to the lands owned by Alexander Ewing at
the time of his death, ^{known as the home farm} which has not been sold
under decree of Court, including all such
interest as they have in that part of the land
claimed by Helen S. Wood, and as to this the
said Kincaid takes his chances for the recovery
thereof, to have and to hold said undivided
interest, consisting of one seventh of two fourths
thereof with all the appurtenances unto the said B. F.
Kincaid and his heirs forever, and the parties
of the first part covenant that they will war-
rant generally, the title to all of the lands not
claimed by said Helen S. Wood and as to
which they will warrant specially, only the
title thereto, Witness the following signatures
and seals.

Cornelia Gibson

Hugh R. Gibson

Seal

Seal

Seal

Seal

Virginia Lee County to wit:

I L. D. Fullerton Notary Public for
the County of Lee ^{in the State of Virginia} do certify that Amelia
Gibson ~~and Hugh Gibson~~ whose name is
signed to the foregoing writing bearing date
August 20th 1890 ^{has} acknowledged the
same before me in my County aforesaid
to be her act and Deed.

Given under my hand this 19th day of Sept 1890.

L. D. Fullerton N. P.

Kentucky Madison County to wit

I L. H. Hill a Clerk of the County
Court for said County do certify that Hugh Gibson
whose name is signed to the foregoing writing
bearing date August 20th 1890 have acknowledged
the same before me in my County aforesaid
to be his act and Deed.

Given under my hand and seal this 26th day of
Sept 1890

L. H. Hill Clerk

Madison County Court

Virginia Lee County to wit:

In the Office of the Clerk of the County
Court for said County the 15th day of October
1900. This Deed was presented and together
with the Certificates thereto annexed, admitted
to record.

Teste: B. M. Morgan Clerk

B F Simco

From

DEED

Amelia Gibson et al

Recorded in Deed Book
No 36 page 478

Examined Oct. 16, 1900
Indexed

(A)

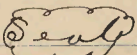
Tax 50
to Lark 1.25
1.75 Paid

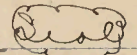
1 Know all men by these presents that we
2 Thomas S Gibson Sr and Amelia C. Gibson are
3 held and firmly bound unto B. F. Strickland
4 in the sum of Two hundred and fifty dollars
5 for the true payment, thereof well and truly
6 to be made unto the said B. F. Strickland, we bind
7 ourselves jointly & severally firmly by these
8 presents And as to this bond we each waive
9 the benefit of our homestead exemption,
10 Witness our hands and seals, this 20th day
11 of August 1890.

12 The Condition of the above bond is such
13 that the above bound Thomas S Gibson hath this
14 day undertaken to bargain and sell to the
15 said B. F. Strickland the undivided interest of
16 Wade M Gibson, Thos S Gibson Jr. Bergoyne
17 H. Gibson & Robert B Gibson in and to all
18 the lands owned by Alexander Ewing at the
19 time of his death, not heretofore sold by decree
20 of Court including such interest as they may
21 have in that part of said land now claimed
22 by Helen S Wood and as to which said Strickland
23 takes his chances for the recovery thereof, for the
24 sum of One hundred and twenty Dollars,
25 which is this day paid to the said Thomas S.
26 Gibson in hand, by the said Strickland being
27 the sum of thirty Dollars for each of said four
28 undivided shares in the said land. And the
29 said Wade M Gibson, Thomas S Gibson Jr, Bergoyne
30 H. Gibson and Robert B. Gibson being now ^{under} 21
31 years of age, and incapable for the present
32 of making a good and valid Deed to their respect

1 The interests in the said land.

2 Now therefore, if the said Wadi M. Gibson
3 Thomas S. Gibson Jr. Burgoyne H. Gibson and
4 Robert B. Gibson shall each on or arising to
5 the years of twenty one, make or cause to be
6 made to said B. F. Skineoid a good and
7 sufficient Deed with covenants of general
8 warranty for their respective interests in
9 the said land, then this bond to be void,
10 otherwise to remain in full force and virtue.

11 Thos. S. Gibson 

12 Correliew Gibson 

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32

Thomas S. Gibson Jr.
Burgoyne H. Gibson
Robert B. Gibson
Wadi M. Gibson
B. F. Skineoid

The Commonwealth of Virginia.

To The Sheriff Of Lee County Greeting:

We Command You to Summon

Wade M. Gibson
Thos S. Gibson Jr. Burgoine St. Gibson
Robert B. Gibson Hugh Gibson Amelia
Gibson, B. F. Thineaid, Lizzie S. Wood
C. E. Merriman Mary Hannah Narcissus
Young & Henry J. Young Margaret
Thompson & John Thompson and
John A. Beatty

To appear at the Clerk's Office of the Circuit Court of Lee County, at the Courthouse on the first Monday in August next, being rule day to answer a bill in Chancery exhibited in our said Court

against

by

Thos. S. Gibson & Guard
for Wade M. Gibson, Thos. S. Gibson Jr

Burgoine St. Gibson & Robert B. Gibson

And have then and there this writ. Witness, J. A. G. Hyatt, Clerk of said Court at the Courthouse.

This 16th day of July 1891, in the 11th year of the Commonwealth.

J. A. G. Hyatt Clerk.

A Copy Teste

J. A. G. Hyatt

I accept legal
service of this
Spa this
28th of July 1891
H. R. Gibson

13-
13-
65-
13

The Commonwealth of Virginia.

To The Sheriff Of Lee County Greeting:

We Command You to Summon

Wade M. Gibson

Thos. S. Gibson Jr. Burgoine St. Gibson

Robert B. Gibson, Hugh Gibson

Amelia Gibson and B. H. Kincaid

Lizzie S. Brown C. E. Harrison Mary Havelock

James H. Brown, John A. Beatty

To appear at the Clerk's Office of the Circuit Court of Lee County, at the Courthouse on the first Monday in August next, being rule day to answer a bill in Chancery exhibited in our said Court

against

them

by

Thos. S. Gibson Guardian

for Wade M. Gibson, Thos. S. Gibson Jr. Burgoine
St. Gibson and Robert B. Gibson

And have then and there this writ. Witness, J. A. G. Hyatt, Clerk of said Court at the Courthouse.

This 16th day of July 1891, in the 11th year of the Commonwealth.

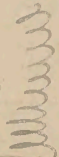
J. A. G. Hyatt Clerk.

A Copy Teste

(34)

(J. J. M)

Thos. S. Gibson Esq

res  Spain Chey

Wade M. Gibson et al

So 1st Aug. Rules 1891.

July 18. 18. 91

Executed in part by
delivering an office copy
to W. J. Sinclair

~~Executed in full
by delivery office
copy July 24. 91~~

~~S. C. Hamilton~~

~~J. S.~~

~~C. E. Flanary.~~

~~S. J. C.~~

and further
executed by de-
livering an office
copy of this and
to Wm. Gibson
Gibson for Wm.
Gibson Thos. S.
Gibson Esq. Benjamin
Gibson Hugh
Gibson & being
A member of the
family of Shelby
Gibson and over
the age of sixteen
years old
S. C. Hamilton
for C. E. Flanary
S. J. C.